



July 2, 1990

Reply To  
Attn Of: HW-113

Dean Fowler, Project Manager  
Spokane County Public Works  
N. 811 Jefferson Street  
Spokane, Washington 99260-0180

Re: Colbert Landfill - Domestic Well Monitoring Program

Dear Mr. Fowler:

The U. S. Environmental Protection Agency (EPA) and the Washington Department of Ecology (Ecology) have reviewed your response to our joint letter dated May 23, 1990. Most of the comments that follow were discussed with you in a meeting on June 14, 1990, in Spokane. We are also enclosing some information which we think you will find useful in responding to several of the comments.

Our major concern with the documents that were submitted is that they are only a part of the process that is currently being used to implement the monitoring program. In order to fully review the existing program additional documents are necessary. We discussed the need for an overall management plan to provide the overall structure for the sampling and analysis processes. The quality assurance and quality control of the monitoring program is clearly a part of the management plan that has to be developed.

The following comments refer to your letter dated June 4, 1990:

1. Your response was submitted to EPA and Ecology according to the requested schedule.
2. The Domestic Well Monitoring (DWM) program was considered important enough to be included in the Consent Decree. Even though the monitoring program did change over the last five years, it is important that the information obtained by the effort be useful information to the end user of the data. In spite of what statements are included in previous letters, this program is required to have data that can determine if domestic well water is potable or contains contaminants. The quality of the data has to be accurate enough to allow comparison with performance criteria.

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3. The DWM program is not an extension of the remedial investigation or feasibility study which was concluded by the Record of Decision (ROD) in September, 1987.
4. The implementation of the program is the responsibility of the county; therefore, it is appropriate that the citizens refer comments to the county and not the county's contractor. It is then the county's responsibility to direct action to the correct person.
5. Although your letter indicated that the DWM data was not compromised, we require more documentation that data obtained since this contractor began collecting samples is still valid. You stated that the county would be able to substantiate the data and only a couple of samples are questionable.
6. There is no specific requirement for a Quality Assurance Project Plan (QAPP) in the Consent Decree for the DWM program, but any monitoring program has to have clear purpose, objectives, methods, management, data control, etc., to be complete. The level of detail needs to be as good as the required outcome of the data. In this case, drinking water has to be measured at less than 1.0 ug/l (micrograms per liter) to be compared with the drinking water standards and performance criteria in the Consent Decree.
7. Completion of a quality assurance program does not require a renegotiation of the Consent Decree or even a part of the the Decree. Some type of QAPP is a part of every monitoring program.
8. Neither EPA nor Ecology can participate in the Sampling Committee as it is proposed in your letter. EPA has an obligation to review the process developed by the Sampling Committee under the direction of the county. EPA is interested in the quality of the results and data through the review of your management process not in the development of the process itself. At the meeting Ecology did propose that a representative from the state Health Department who has experience in domestic well sampling would be a good candidate as a technical representative on this committee. Ecology agreed to pursue this with the health department and make this person available if desired by the county.



The next comments are from the meeting held June 14, 1990:

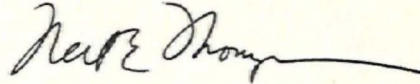
9. We stated in the meeting that no problems had been identified with the laboratory analysis part of the DWM program. However, for the QAPP to be complete, not only the sampling methods have to be stated, but the analytical methods have to be adequately referenced, and sample custody has to be clear or the analytical data may not meet the criteria that is required for comparison with the performance criteria.
10. The material that was submitted to us did not include any document that described the process that is being used to run the monitoring program. The development of a management plan was mentioned and this may be a way to tie the different aspects of the program together.
11. The community that is affected has shown a high level of interest. We have the responsibility to keep them appraised of the changes in the well monitoring program. Your continued interactions with the community during the development of the process and any changes that get implemented will continue the work that has facilitated a better understanding of the results of the well monitoring program.

Enclosed is an example of a process that could be used to develop a QAPP for the Domestic Well Monitoring program. Clearly some type of overall management plan is needed to establish the framework for obtaining and reviewing all the monitoring data.

The next deliverable that has been requested and agreed upon is the schedule for submitting the QAPP and Sampling and Analysis Plan. The schedule is due within two weeks after receipt of this letter. More important than an overly ambitious schedule is the content of the required plans. The management plans that get developed need to clearly outline the process for obtaining adequate data to evaluate the domestic well water in the area. The level of detail has to be sufficient for EPA and Ecology to follow the logic of the process and for us to determine that the data obtained using the process will provide adequate data and controls for identifying any discrepancies or problems. The revision to the sampling and analysis protocol to clarify sampling locations and peculiarities is an appropriate action. After the county DWM program management plan gets developed, another look at this revised protocol may be appropriate.

We appreciate your concerns for this program and your support at the meeting demonstrated your cooperative position on implementing the Colbert Landfill Consent Decree. Please contact either Mike Kuntz, Ecology Project Manager (telephone 206-438-3079), or me (telephone 206-442-7177) if you have any questions or comments.

Sincerely,



Neil E. Thompson  
Project Manager

Enclosure

cc: Mike Kuntz, Ecology